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14 Attorneys for Defendant

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF ARIZONA**

17 United States of America,  
18 Plaintiff/Respondent,  
19 v.  
20 Abdul Malik Abdul Kareem,  
21 Defendant/Movant.

2:15-cr-00707-SRB

**MOTION FOR LEAVE TO FILE A  
MODIFIED RECORDING FROM  
THE POLE CAMERA RECORDING  
TAKEN AT 13850 N. 19<sup>TH</sup> AVE. #219,  
PHOENIX, ARIZONA**

22 The Defendant, Abdul Malik Abdul Kareem (“Kareem”) moves this Court to  
23 accept as an exhibit the attached DVD which is a modified recording from the pole  
24 camera recording at 13850 N. 19<sup>th</sup> Ave. #219, Phoenix, Arizona, from the evidentiary  
25 hearing that was held on October 16-18, 2019. FBI employees, at the direction of AUSAs  
26 Koehler and Brook, exported the video from a tape to the DVD that is enclosed. We are  
27 told by AUSA Koehler that the MP4 version of the file seems to work best on computers.  
28 A reviewer can rewind, fast-forward, and skip to portions within the video.

1       Lastly, the video camera does not get pointed toward the breezeway of the  
2 Simpson/Soofi apartment until 2:00 p.m. on May 1, 2015, approximately 33 minutes after  
3 the camera was activated and the video began recording.

4       The Government has stipulated to the filing of this motion.

5       RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of December, 2019.

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7       **MAYNARD CRONIN ERICKSON**  
8       **CURRAN & REITER, P.L.C.**

7       **DRAKE LAW, PLC**

9       /s/Daniel D. Maynard  
10       DANIEL D. MAYNARD

9       /s/Daniel R. Drake  
10       DANIEL R. DRAKE

11  
12                                   **CERTIFICATE OF SERVICE**

13       I hereby certify that on December 16, 2019, I electronically transmitted the  
14 attached document to the Clerk's Office using the CM/ECF System for filing and  
15 transmittal of a Notice of Electronic Filing to CM/ECF registrants:  
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19                                   /s/Stacey McClellan  
20                                   Stacey McClellan  
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